UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

ANNE ARMSTRONG and
ALAN GORDON,
Plaintiffs,

v. C.A. NO.16-403

PETER KILMARTIN, in his capacity
as Attorney General, et al.
Defendants,

ANSWER OF DEFENDANT DAN LYNCH APOSTOLATES

1 - 15 - Introduction - No Answer Required

16: Deny as it relates to this Defendant. Insufficient information to admit or deny as it relates to other Defendants.

17: Deny as it relates to this Defendant . Insufficient information to admit or deny as it relates to other Defendants.

18: Deny.

19: Defendant admits his address and that he is a retired judge from the State of Vermont and that he is affiliated with The Missionary Image of Our Lady of Guadalupe, Inc., Denies that Dan Lynch Apostolates is a company and has insufficient information to admit or deny the other allegations.

20: Insufficient information to admit or deny.

21: Insufficient information to admit or deny.

22: Insufficient information to admit or deny.

23. Insufficient information to admit or deny.

24: Insufficient information to admit or deny.

25: Deny.

26: Deny.

27: Insufficient information to admit or deny.

28: Insufficient information to admit or deny.

29: Insufficient information to admit or deny.

30: Insufficient information to admit or deny.

31: Insufficient information to admit or deny.

32: Insufficient information to admit or deny.

33. Deny as to this Defendant; Insufficient information to admit or deny as it relates to other Defendants.

34: Insufficient information to admit or deny.

35: Deny.

36: Deny.

37: Deny.

RELATES TO DIFFERENT DEFENDANTS #38 - 122

#38 - #122 Insufficient information to admit or deny.

WHEREFORE: Defendant, Daniel Lynch Apostolates requests that the petition of the Plaintiffs be denied and that their claims be dismissed.

DEFENSES

1. The claims of the Plaintiffs fail to state a claim upon which relief can be granted.

2. The claims of the Plaintiffs fall within Rhode Island General Laws 9-33 et seq. as they are Limits on Strategic Litigation against Public Participation. The Plaintiffs are seeking "to chill the valid exercise of the constitutional rights of freedom of speech and petition for redress of grievances" as the Plaintiffs are suing the Defendant Daniel Lynch for his lawfully reporting an alleged crime to law enforcement authorities.

3. The Plaintiffs claims should be barred by the doctrine of unclean hands and bad faith dealings.

4. The Plaintiffs claims should be dismissed for lack of jurisdiction over the person as Dan Lynch Apostolates is not a person in the eyes of the law as it is not a company, nor a corporation but simply a registered trade name in the State of Vermont for two nonprofit corporations

DAN LYNCH APOSTOLATES
By their attorneys

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## CERTIFICATION

I hereby certify that this document has been filed through the ECF System and will be sent electronically to the registered participants on the Notice of Electronic Filing (NEF) and additionally sent to Plaintiffs Anne Armstrong and Alan Gordon by regular mail at 99 Hudson Pond Road, West Greenwich, RI 02817.